REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed July 2, 2004. Reconsideration and allowance of the application and pending claims are respectfully requested.

As an initial matter, Applicant would like to address the "Response to Arguments" section of the Office Action. Specifically, Applicant objects to the Examiner's casual allegation that "MIYAKE et al. US Patent No. 6,732,170 anticipates claims 1-3, 5-10, 12-14, 16-19 and 21." First, Applicant disagrees with this assessment and, to the contrary, believes that Applicant's claims are allowable over Miyake. Second, if the Examiner believes that claims 1-3, 5-10, 12-14, 16-19 and 21 are anticipated by Miyake, the Examiner should provide a proper explanation, in compliance with the Manual of Patent Examination Procedure (MPEP), as to how Miyake teaches each and every limitation of those claims so that Applicant has a full opportunity to respond to that allegation. If the Examiner cannot provide this, the Examiner should withdraw the statement that those claims are anticipated by Miyake.

Claim Rejections - 35 U.S.C. § 102(b)

Claims 1-23, 25-26, 28-29, and 31-32 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Richter, et al. ("Richter," U.S. Pat. No. 6,678,068). Applicant respectfully traverses this rejection.

A. The Richter Disclosure

The Examiner now rejects Applicant's claims under Richter. As the following will show, the Richter reference, like the other references that have been applied against

Applicant's claims during prosecution of the instant application, has little to do with Applicant's claimed inventions.

Richter discloses a "client printer server link." As is described by Richter, a printer server link application 16 is located at a client computer 12 (see Figs. 1-3), and allows a user located at that computer (i.e., remote from any printing devices; see Figs. 1-3) to access one or more printer servers 32a-32n and "output devices" 40a-40n that are capable of printing documents. Richter, column 5, lines 14-17. The client print server link 16 provides the user with pertinent information regarding the status of the user's print jobs (Richter, column 5, lines 18-20) and, more particularly, permits the user to "selectively view" that status on the computer (Richter, column 5, lines 38-44; column 8, lines 13-19).

Significantly, Richter is silent as to transmitting graphical data representing a graphic to be displayed on one of the "output devices," or even displaying *any* graphics on the output devices.

B. Applicant's Claimed Inventions

As has been described in previous responses, Applicant claims systems and methods FOR FACILITATING DISPLAY OF A GRAPHIC ON AN ELECTRICAL DEVICE. In the following, Applicant discusses each of Applicant's claim groupings, and identifies several of the deficiencies of the Richter reference in anticipating Applicant's claims.

1. Claims 1-8 and 22-23

Applicant's independent claim 1 provides (emphasis added):

> 1. A ***method for facilitating display of a graphic on an electrical device***, comprising:
>
> receiving from a user a selection of graphical data representing ***a graphic to be transmitted to an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a network appliance***; and
>
> facilitating transmission of the graphical data representing the graphic to the electrical device such that the electrical device can ***display the graphic in a control panel display of the electrical device***.

As an initial matter, Applicant notes that, as described above, Richter does not teach or suggest facilitating display of a graphic on Richter's "output devices" (i.e., Richter's "electrical devices"). It logically follows that Richter does not teach or suggest a "method for facilitating display of a graphic on an electrical device" as is explicitly required by claim 1.

In the Office Action, it states that the Examiner "interprets" Richter to disclose such a method. What is telling, however, is that Richter does not even describe Richter's output devices as comprising any means for displaying any graphics whatsoever. Given this fact, one cannot reasonably "interpret" Richter as disclosing a method for facilitating display of a graphic on an electrical device.

As is abundantly clear from the Richter disclosure, Richter simply does not anticipate the display of graphics described in Applicant's claims. The reason for this is simple: Richter's invention is a user interface that executes *on the user's computer*. It could therefore be argued that one purpose of Richter's invention is to provide all visual

information to the user at the user's computer as opposed to the device that outputs the printed documents.

From the above, it is likewise clear that Richter does not anticipate "receiving from a user a selection of graphical data representing a graphic to be transmitted to an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a network appliance". Specifically, Richter does not teach or suggest sending any graphical data to Richter's output devices, except that which is to be used to generate a printed document. Furthermore, Richter does not anticipate "facilitating transmission of the graphical data representing the graphic to the electrical device such that the electrical device can display the graphic in a control panel display of the electrical device". Again, Richter says nothing about *displaying* graphics on Richter's output devices.

2. Claims 9-13 and 25-26

Applicant's independent claim 9 provides (emphasis added):

> 9. A ***system for facilitating display of a graphic on an electrical device***, comprising:
>
> means for receiving from a user a selection of graphical data representing a ***graphic to be transmitted to an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a network appliance***; and
>
> means for facilitating transmission of the graphical data representing the graphic to the electrical device such that the electrical device can ***display the graphic in a control panel display of the electrical device***.

As an initial matter, Applicant notes that Richter does not teach or suggest a "system for facilitating display of a graphic on an electrical device" as is explicitly required by claim 9 for reasons described above in relation to claim 1.

As for the body of claim 9, Richter does not anticipate "means for receiving from a user a selection of graphical data representing a graphic to be transmitted to an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a network appliance" because, as is discussed above in relation to claim 1, Richter does not teach or suggest sending any graphical data to Richter's output devices, except that which is to be used to generate a printed document.

Richter also does not anticipate "means for facilitating transmission of the graphical data representing the graphic to the electrical device such that the electrical device can display the graphic in a control panel display of the electrical device". Once again, Richter says nothing about *displaying* graphics on Richter's output devices.

3. Claims 14-18 and 28-29

Applicant's independent claim 14 provides (emphasis added):

> 14. A ***method for facilitating display of a graphic on an electrical device***, comprising:
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> ***receiving graphical data using an electrical device that is one of a printer, photocopier, a facsimile machine, a multifunction peripheral, and a network appliance, the graphical data having been selected by a user from a computing device***;

receiving an indication as to how a graphic represented by the selected graphical data is to be displayed; and

displaying the graphic in a control panel display of the electrical device according to the received indication as to how the graphic is to be displayed.

As is described in the foregoing, Richter does not teach or suggest transmitting graphical data *for display* on Richter's output devices. It therefore follows that Richter does not anticipate any of "a method for facilitating display of a graphic on an electrical device", "receiving graphical data using an electrical device that is one of a printer, photocopier, a facsimile machine, a multifunction peripheral, and a network appliance, the graphical data having been selected by a user from a computing device", or "displaying the graphic in a control panel display of the electrical device" as are required by claim 14.

Furthermore, Applicant notes that Richter fails to teach or suggest "receiving an indication as to how a graphic represented by the selected graphical data is to be displayed" on the electrical device. Clearly, if Richter does not provide graphical data for display on an electrical device, it follows that Richter does not provide indications as to how that data is to be displayed by the electrical device.

4. Claims 19-21 and 31-32

Applicant's independent claim 19 provides (emphasis added):

19. A ***system for facilitating display of a graphic on an electrical device***, comprising:

means provided on an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a

network appliance for receiving graphical data that has been selected by the user from a computing device;

means provided on the electrical device for receiving an indication as to how a graphic represented by the selected data is to be displayed; and

means provided on the electrical device for displaying the graphic in a control panel display of the electrical device according to the received indication as to how the graphic is to be displayed.

Once again, Richter does not teach or suggest transmitting graphical data *for display* on Richter's output devices. It therefore follows that Richter does not anticipate any of "a system for facilitating display of a graphic on an electrical device", "means provided on an electrical device that is one of a printer, a photocopier, a facsimile machine, a multifunction peripheral, and a network appliance for receiving graphical data that has been selected by the user from a computing device", or "means provided on the electrical device for displaying the graphic in a control panel display of the electrical device".

Furthermore, Applicant notes that Richter fails to teach or suggest "means provided on the electrical device for receiving an indication as to how a graphic represented by the selected data is to be displayed" on the electrical device. Clearly, if Richter does not provide graphical data for display on an electrical device, it follows that Richter does not provide means for receiving indications as to how that data is to be displayed by the electrical device.

C. Conclusions

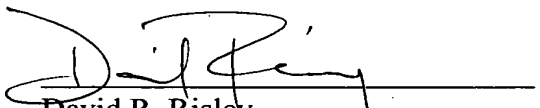
From the above, it is clear that the Richter reference is woefully deficient in anticipating Applicant's claims. In fact, the Richter disclosure is so far afield from what

Applicant is claiming that it is unclear why the Richter reference was cited against Applicant's claims at all. Regardless, the shortcomings of the Richter reference reveal that Richter cannot reasonably be said to anticipate any of Applicant's claims. Therefore, Applicant respectfully requests that the rejection of those claims be withdrawn.

Given the questionable relevance of the Richter reference as to Applicant's claims, it appears that the Examiner does not understand Applicant's inventions. Applicant therefore respectfully requests that the Examiner review Applicant's written description to better understand the claimed inventions. If, after doing so, the Examiner cannot locate prior art that legitimately anticipates those claims or renders them obvious, Applicant respectfully requests that the Examiner allow the case.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Alexandria, Virginia 22313-1450, on

8-30-04

Mary Meegan

Signature